

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

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STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

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COMMERCE COMMISSION

E. Jerome Malry,)

Complaint as to Improper Servicing)

Account, Request for Audit and)

Investigation, in Chicago, Illinois.)

Docket No. 04-0577

2004 OCT 15 11:45
CHIEF CLERK'S OFFICE

**PEOPLES ENERGY CORPORATION'S REPLY TO
STATEMENT OF COMPLAINT AND REQUEST FOR RELIEF**

Peoples Energy Corporation, ("Peoples Energy") hereby files its Answer by and through its attorneys, McGuireWoods LLP, as follows:

1. As of at least 1/8/2004, there has been an amount in dispute of \$3,350.27 regarding the building at 4344 North Clarendon Avenue.

ANSWER: Respondent denies the allegations contained in paragraph 1 of Complainant's Statement of Complaint and Request for Relief.

2. From at least 1/8/2004 through 8/6/2004 Mr. Malry has paid all current service charges in full (not including the amount in dispute).

3. **ANSWER:** Respondent denies the allegations contained in paragraph 2 of Complainant's Statement of Complaint and Request for Relief.

4. On the billing date of 7/8/2004 Peoples Energy indicates that the building located at 4344 North Clarendon Avenue now includes a "transferred In Final Bill" amount of \$27,491.46 and a "transfer to 450002190706 (building located at 5007 South King Drive)" amount of \$3,350.27.

ANSWER: Respondent denies the allegations contained in paragraph 3 of Complainant's Statement of Complaint and Request for Relief.

5. On the billing date of 8/6/2004 Peoples Energy indicates that the building located at 4344 North Clarendon Avenue included a late fee of \$443.70.

ANSWER: Respondent denies the allegations contained in paragraph 4 of Complainant's Statement of Complaint and Request for Relief.

6. Peoples Energy has not provided an explanation, justification, and or an outlined estimation for the disputed amount of \$3,350.27.

Exhibit 4

ANSWER: Respondent denies the allegations contained in paragraph 5 of Complainant's Statement of Complaint and Request for Relief.

7. Peoples Energy has not provided an explanation and/or justification for requesting payment in full of the amount in dispute.

ANSWER: Respondent denies the allegations contained in Paragraph 6 of Complainant's Statement of Complaint and Request for Relief.

8. Peoples Energy without explanation, justification, wrongfully and/or negligently imposed a late fee of \$443.70 located on the billing statement of 8/6/2004.

ANSWER: Respondent denies the allegations contained in Paragraph 7 of Complainant's Statement of Complaint and Request for Relief.


9. Peoples Energy has not provided an explanation, justification, and/or an outlined estimation for amount a transferred in final bill amount of \$27,491 or for a transfer amount of \$3,350.27.

ANSWER: Respondent denies the allegations contained in Paragraph 8 of Complainant's Statement of Complaint and Request for Relief.

Respectfully submitted,

PEOPLES ENERGY CORPORATION

By:


One of the Attorneys for
Peoples Energy Corporation

Greta G. Weathersby
Erin L. Ziaja
Attorneys for Peoples Energy Corporation
McGuireWoods LLP
77 West Wacker Drive, Suite 4400
Chicago, IL 60601-1681
312.849.8100
Firm No. 40426

CERTIFICATE OF SERVICE

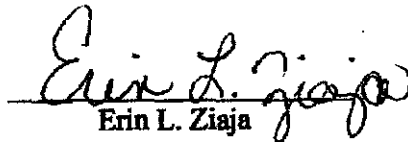
I, Erin L. Ziaja, an attorney, certify that I caused a copy of the Peoples Energy Corporation's Reply To Statement Of Complaint And Request For Relief to be served by placing a copy in the United States Mail, first-class postage prepaid, on October 13, 2004.

By: Erin L. Ziaja
Erin L. Ziaja

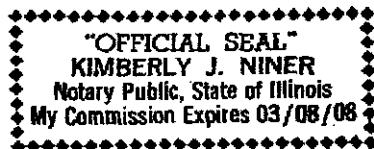
Greta G. Weathersby
Erin L. Ziaja
Attorneys for
The Peoples Gas Light and Coke Company
McGuireWoods LLP
77 West Wacker Drive, Suite 4100
Chicago, IL 60601-1681
312.849.8100

VERIFICATION

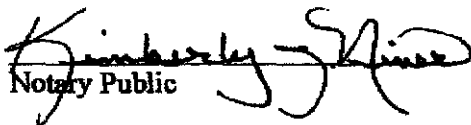
I, Erin L. Ziaja, an attorney, under the penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, certify that the allegations set forth in this Answer are true and correct to the best of my knowledge, information and belief, except as to matters herein stated to be on information and belief, and as to such matters, I certify as aforesaid that I verily believe the same to be true.


Erin L. Ziaja

Executed: October 13, 2004



Subscribed and sworn to before me
this 13 day of October 2004.


Notary Public